

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Comcast Cable Communications, LLC,)
on behalf of its subsidiaries and affiliates)
)
For Determination of Effective Competition in:) CSR-8854-E
7 Washington Franchise Areas) MB Docket No. 13-286

To: Office of the Secretary
Attn: Chief, Media Bureau

SUPPLEMENT

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates (“Comcast”), hereby submits this Supplement to the “Petition for Special Relief” (“Petition”) filed by Comcast on November 15, 2013 in the above-referenced proceeding. The purpose of this Supplement is to update the record for recent annexations by the communities of Burien and Kent. This update confirms that the “Competing Provider Test” remains satisfied in each of these communities.

In demonstrating that Comcast faces “effective competition” in the various franchise areas at issue, Comcast’s Petition relied on household figures from the 2010 U.S. Census.¹ By email dated December 26, 2013, Elana Zana, counsel for Burien and Kent, advised Comcast that the 2010 Census data did *not* include households associated with subsequent annexations by those communities.² Attachments to the December 26 Email from the State of Washington Office of Financial Management (the “OFM”) show that in 2010, Burien annexed an area with

¹ See Petition, Exhibit 5.

² The email (the “December 26 Email”) and the accompanying attachments are appended hereto as Exhibit A.

5,135 occupied households and Kent annexed an area with 8,582 households.³ When the household figures associated with the annexations are added to those reported in the 2010 Census, the updated occupied household figure is 18,388 (5,135 + 13,253) for Burien and 42,626 (8,582 + 34,044) for Kent.

Comcast has confirmed that its Petition, as filed, did not include ZIP+4 data (or the corresponding DBS subscriber data) for the recently annexed areas.⁴ To update the record, Comcast asked SNL Kagan (“SNL”) to identify the ZIP+4 codes associated with each of the individual annexed areas. Comcast then submitted the ZIP+4 lists to the Satellite Broadcasting and Communications Association (“SBCA”) for a tally of the DBS subscribers associated with the new ZIP+4 numbers. According to the SBCA, the area annexed by Burien contains 1,138 DBS subscribers, and the area annexed by Kent contains 1,831 DBS subscribers.⁵ When the DBS subscriber figures associated with the annexations are added to those reported in the Petition for the original portion of each community, the updated DBS subscriber figure is 3,440 (1,138 + 2,302) for Burien and 7,099 (1,831 + 5,268) for Kent, which results in a competing provider penetration rate of 18.71 percent and 16.65 percent, respectively.⁶ This is

³ See Exhibit A.

⁴ See Declaration of Chris Orgon, attached hereto as Exhibit B.

⁵ The DBS subscriber numbers reported in the attached Effective Competition Tracking Reports from SBCA reflect the total DBS subscribers within the individual ZIP+4 codes associated with the respective annexed areas. See Exhibit C (providing total ZIP+4-based DBS subscribership for each of the annexed areas, as well as all ZIP+4 data obtained from SNL for these areas.).

⁶ See Exhibit D.

actually a higher penetration rate for these two communities than Comcast originally reported and above the 15 percent threshold required under Section 623(l)(1)(B) of the Act.⁷

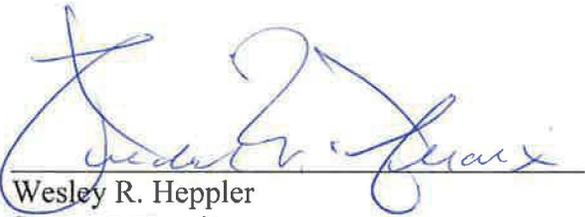
CONCLUSION

Based on the evidence presented in the Petition and this Supplement, Comcast respectfully requests that the Media Bureau issue an order acknowledging the presence of effective competition in each of the seven Washington Franchise Areas.

Respectfully submitted,

**Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates**

By:



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January 16, 2014

Its Attorneys

⁷ In addition to providing 2010 occupied household data for the annexed areas, the December 26 Email includes "Local Review Worksheets," with preliminary 2013 *estimated* occupied household figures of 18,550 for Burien and 43,489 for Kent. *See* Exhibit A. Even if the updated DBS subscriber counts are compared to these slightly higher household estimates instead of the revised 2010 household figures discussed above, the resulting DBS penetration rate is still in excess of the 15 percent threshold: Burien ($3,440 / 18,550 = .1854$); Kent ($7,099 / 43,489 = .1632$).

CERTIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)

The below-signed signatory has read the foregoing Supplement, and to the best of my knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; and is not interposed for any improper purpose.

Respectfully submitted,

**Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates**

By:


Frederick W. Giroux
DAVIS WRIGHT TREMAINE LLP 1919
Pennsylvania Avenue, N.W., Suite 800
Washington, DC 20006
(202) 973-4200

January 16, 2014

Its Attorney

EXHIBIT A

Giroux, Fred

From: Elana R. Zana <ezana@omwlaw.com>
Sent: Thursday, December 26, 2013 2:05 PM
To: Giroux, Fred
Cc: Jefferson Lin
Subject: Burien and Kent Census data
Attachments: FW. Kent and Burien Annexation (1130838x7ACF2).msg; RE: Kent and Burien Annexation

Fred,

It was good speaking with you this morning. As we discussed, it appears that the 2010 Census data does not contain the annexations for both Burien and Kent. I have attached to this email 2 emails that we have received from OFM describing the annexation process, census and the new occupied household numbers for both cities. Please note that one of the emails contains an attachment directly from the OFM with the 2013 census for occupied housing units. OFM also shows the annexations and the occupied households for those annexations here: <http://www.ofm.wa.gov/pop/annex/default.asp> (click on Annexation database January 1, 2010-March 31, 2013).

Please let me know if you have any questions. I look forward to hearing back from you regarding timeline and next steps.

Regards,

Elana

Elana Zana | Attorney

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901 Fifth Avenue, Suite 3500 Seattle, WA 98164
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Circular 230 Disclosure: The IRS requires us to disclose to you that any federal tax advice contained herein was intentionally written without the requisite formality and scope needed for use as protection against federal accuracy related tax reporting penalties, and therefore cannot be used for that purpose. Furthermore, while you are not prohibited from disclosing such federal tax treatment or tax structure to a third party, it is our understanding that our advice will not be used by you to promote, market or recommend to another party any matters addressed herein. We would, of course, be happy to discuss with you the additional requirements of a written tax opinion which you may use for accuracy related penalty protection. If you would like to discuss such an opinion please contact me.

Giroux, Fred

From: Jefferson Lin
Sent: Monday, December 23, 2013 2:39 PM
To: Elana R. Zana
Subject: FW: Kent and Burien Annexation

It looks like the **Kent annexation added 8582 occupied housing units** and the **Burien annexation added 5135 occupied housing units**.

I'll follow up with Erica to see if there's a reference on the Census website about what areas are included. I also spoke with someone from the US Census Bureau, and it seems like it is up to the state to determine what boundaries are included in the Census data. So, 4/1/2010 was the cutoff for determining the boundaries for the Census data—not the cutoff for collecting data like I said earlier--- people could fill out the Census questionnaires from 4/1/2010 through the end of the year.

Jefferson Lin | Attorney

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From: Gardner, Erica (OFM) [<mailto:Erica.Gardner@OFM.WA.GOV>]
Sent: Monday, December 23, 2013 11:18 AM
To: Jefferson Lin
Subject: Kent and Burien Annexation

Jefferson,
I have attached two screen shots of the Kent and Burien annexations.
Let me know if you have any questions.
Thanks,
Erica

Burien is below.



Annexation

Amend Annexation Find Annexations

527

Annexation Name **North Highline**

Original Ordinance **527** Amending Ordinance

Effective Date **04/01/2010** Approval Date **04/22/2010**

Total Area **1,675** OFM File Number **2010-25**

Total Population **14,222**

Comment **2/1/2012: This area not included in federal Census 2010 boundaries. See Special Notation. Pop/HU not edited to zero. 4/23/10: Richard will check out the two GQ facilities and their type, etc. on Tuesday. GQ count not included in above number but is in number below. 04/22/2010: No phone number for The Willows. Per internet**

Approved



Status	Completed
Certificate	<input type="checkbox"/>
Ordinance	<input type="checkbox"/>
Map	<input type="checkbox"/>
Census	<input type="checkbox"/>
Not for an Estimate	<input type="checkbox"/>
Received by OFM	01/12/2010
Received Word Doc	
Sent to DOT	01/12/2010
Approved by DOT	01/13/2010
Returned to City	06/07/2010

1

Parcel Number **1**

Area of Parcel **1,675** Population of Parcel **14,292**

Annexation Type

- Annexation
- Historical Annexation
 - Mutual Boundary Adjustment
 - Street Annexation Only

Special Notation **2 GQ facilities. Was not included in federal Census 2010 boundaries.**

Housing Units

Structure Type	Total Units	Vacant Units	Occupied Units	Population	PPH	Occupancy Rate	Vacc
1 Unit	3,707	189	3,518	10,557	3.000853	0.949015	
2 Units	156	17	139	416	2.992806	0.891026	
3 Units	33	2	31	93	3.000000	0.939394	
4 Units	124	14	110	278	2.527273	0.887097	
5+ Units	1,446	169	1,277	2,760	2.161316	0.883126	
Mobile Homes	0	0	0	0	0.000000	0.000000	
Specials	60	0	60	118	1.966667	1.000000	
TOTALS	5,526	391	5,135	14,222	2.769620	0.929244	

Mobile Home Parks

Selection Controls

2014

Kent

King County

Annexation

Amend Annexation Find Annexations

3936

Data Entry

Annexation

Census Summary

Form A/C

Group Quarters

Military Adjustment

Mobile Home Parks

Selected Other Housing

Estimate

Estimate Detail

Estimate Summary

History

Annexation

Census

Frame Housing

Group Quarters

Mobile Homes/Specials

Population

Selected Other Housing

Annexation Name Panther Lake

Original Ordinance 3936 Amending Ordinance

Effective Date 07/01/2010 Approval Date 08/16/2010

Total Area 3,347 OFM File Number 2010-63

Total Population 25,371

Comment 8/16/2010: area is actually 3,347 acres; 5.22 sq. mi.
08/10/2010 - Received annexation certificate.
07/22/2010 - Richard dropped off the census.
3/24/10: received by email

1

Parcel Number 1

Area of Parcel 3,347 Population of Parcel

Special Notation Has group quarters.

Housing Units

Structure Type	Total Units	Vacant Units	Occupied Unit	Population
1 Unit	6,905	309	6,596	20,878
2 Units	58	1	57	142
3 Units	12	6	6	12
4 Units	296	23	273	722
5+ Units	1,116	94	1,022	2,380
Mobile Homes	658	30	628	1,237
Specials	0	0	0	0
TOTALS	9,045	463	8,582	25,371

Giroux, Fred

From: Gardner, Erica (OFM) <Erica.Gardner@OFM.WA.GOV>
Sent: Monday, December 23, 2013 6:07 PM
To: Jefferson Lin
Subject: RE: Kent and Burien Annexation
Attachments: 20131223150312282.pdf

Jefferson,

1. The relevant date is Jan 1 2010, you can see it stated on this page.
http://www.census.gov/geo/partnerships/bas/bas_annex.html
2. The population and housing data come from a census of the annexed area. Because these were large Censuses, the city was in contact with us early to make sure all of their paperwork was correct. The actual Census of the annexed area does not occur until after the annexation is effective. The city conducts the Census and sends us the Census documentation and results for approval.
3. I am attaching the 2013 Local Review Sheet for both Burien and Kent. We send these to the cities for review before our population estimates become official. If there are no changes (there weren't any for these cities in 2013), these documents represent the official data. You will see occupied housing for total and by structure type are listed.

Please let me know if you have any questions.

Thanks,
Erica

Erica Gardner, PhD
Senior Forecast Analyst
Office of Financial Management
Forecasting Division
GA Building, 3rd floor
Olympia, WA 98504
E-mail: erica.gardner@ofm.wa.gov
Phone: 360-902-0535

From: Jefferson Lin [<mailto:jlin@omwlaw.com>]
Sent: Monday, December 23, 2013 1:34 PM
To: Gardner, Erica (OFM)
Subject: RE: Kent and Burien Annexation

Erica,

Thanks for getting back to me so quickly. This is great information. I have a couple follow-up questions:

- Is there anywhere else that I can cite to that says these annexed areas are not part of the 2010 federal census boundaries for Kent and Burien (besides the brief note in the comments section for the Burien annexation)? OR, is there something to cite to regarding what you mentioned about April 1 or January 1 being the cut-off date for determining the boundaries for the federal census?
- Do you know where the data for these annexed areas come from? Do the cities conduct a separate census or are they using 2000 census data? It looks like these numbers were derived before completion of the 2010 federal census because they were submitted in January and March of 2010.

Thanks for your assistance,

Jefferson Lin | Attorney

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From: Gardner, Erica (OFM) [<mailto:Erica.Gardner@OFM.WA.GOV>]
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To: Jefferson Lin
Subject: Kent and Burien Annexation

Jefferson,
I have attached two screen shots of the Kent and Burien annexations.
Let me know if you have any questions.
Thanks,
Erica

Burien is below.

2013 Population Local Review Worksheet: City: Burien County: King

Direct any questions to 360/902-0599 Response deadline is July 03, 2013

SECTION 1. UPDATE OF HOUSING and POPULATION. Frame housing in Cols. B through E are updated by construction and demolition as reported by cities and towns (Form A). *Mobile Homes and Special Housing are from Section 3 below.*

	A. Total Units	B. 1-Unit	C. 2-Unit	D. 3 & 4- Unit	E. 5 or More Unit	F. Mobile Homes/ Trailers	G. Special Housing
1. 2010 Base Census Housing *	14,322	8,613	124	515	5,062	8	0
2. Net Housing Unit Change: Base Census to Estimate Year. <i>Excludes Annexations 4/2/2012 through 4/1/2013</i>	5,628	3,789	162	163	1,453	0	61
3. Housing Estimate = (1)+(2)*	19,950	12,402	286	678	6,515	8	61
4. Occupancy Rate	0.929825	0.949037	0.909995	0.897122	0.896820	1.000000	1.000000
5. Occupied Units = (3) * (4)	18,550	11,770	260	608	5,843	8	61
6. Household Size	2.569542	2.806299	2.641732	2.690516	2.083950	2.000000	1.950820
7. Household Population = (5) * (6)	47,665	33,030	687	1,636	12,177	16	119
8. Other Military Housing	0	0	0	0	0	0	0
9. Occupied Units	0	0	0	0	0	0	0
10. Population	0	0	0	0	0	0	0
11. Annexed Housing 4/2/2012 thru 4/1/2013	0	0	0	0	0	0	0
12. Occupied Units	0	0	0	0	0	0	0
13. Population	0	0	0	0	0	0	0

SECTION 2. SUMMARY ALL HOUSING AND POPULATION

14. All Housing Units	19,950	12,402	286	678	6,515	8	61
15. Occupied	18,550	11,770	260	608	5,843	8	61
16. Occupancy Rate	0.929825	0.949037	0.909995	0.897122	0.896820	1.000000	1.000000
17. Persons Per Household	2.569542	2.806299	2.641732	2.690516	2.083950	2.000000	1.950820
18. Household Population	47,665	33,030	687	1,636	12,177	16	119
19. Group Quarters Population							362
20. All Population = (18) + (19)							48,027

*Less Other Military Housing or population in Other Housing if applicable.

2013 Population for Review and Comment: 48,030 ←

SECTION 3. DEVELOPMENT OF MOBILE HOMES, SPECIAL UNITS AND GROUP QUARTERS These are the housing and population categories that require a count by the cities each year on the data collection form (Form A).

	Count of Mobile Homes/TR	Count of Special Housing Units	Count of Population in Special Housing Units	Count of Group Quarter Population
1. Base Census Count	8	0	0	300
2. City Count at Base Census.....	8	0	0	132
3. City Count at Estimate date 2013.....	8	61	119	194
4. Difference = (3) - (2)	0	61	119	62
5. Annexations 4/2/2012 through 4/1/2013	0	0	0	0
6. Estimate 2013 =(1) + (4) + (5)	8	61	119	362

*Less Other Military Housing or population in Other Housing if applicable.

COMMENTS:

The 2010 Census counted the population in El Dorado Retirement Villa in the regular housing and population counts instead of group quarters (GQ). In order to be consistent with the 2010 Census count we will drop this facility from OFM's GQ tracking list.

2013 Population Local Review Worksheet: City: Kent County: King

Direct any questions to 360/902-0599 Response deadline is July 03, 2013

SECTION 1. UPDATE OF HOUSING and POPULATION. Frame housing in Cols. B through E are updated by construction and demolition as reported by cities and towns (Form A). *Mobile Homes and Special Housing are from Section 3 below.*

	A. Total Units	B. 1-Unit	C. 2-Unit	D. 3 & 4- /Unit	E. 5 or More Unit	F. Mobile Homes/ Trailers	G. Special Housing
1. 2010 Base Census Housing *	36,424	17,966	484	2,060	14,690	1,224	0
2. Net Housing Unit Change: Base Census to Estimate Year. <i>Excludes Annexations 4/2/2012 through 4/1/2013</i>	9,687	7,570	60	323	1,130	604	0
3. Housing Estimate = (1)+(2)*	46,111	25,536	544	2,383	15,820	1,828	0
4. Occupancy Rate	0.943137	0.955041	0.974956	0.940865	0.923605	0.939902	0.000000
5. Occupied Units = (3) * (4)	43,489	24,388	530	2,242	14,611	1,718	0
6. Household Size	2.735450	3.059075	2.760000	2.408495	2.308276	2.193512	0.000000
7. Household Population = (5) * (6)	118,962	74,605	1,463	5,400	33,726	3,768	0
8. Other Military Housing	0	0	0	0	0	0	0
9. Occupied Units	0	0	0	0	0	0	0
10. Population	0	0	0	0	0	0	0
11. Annexed Housing 4/2/2012 thru 4/1/2013	0	0	0	0	0	0	0
12. Occupied Units	0	0	0	0	0	0	0
13. Population	0	0	0	0	0	0	0

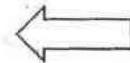
SECTION 2. SUMMARY ALL HOUSING AND POPULATION

14. All Housing Units	46,111	25,536	544	2,383	15,820	1,828	0
15. Occupied	43,489	24,388	530	2,242	14,611	1,718	0
16. Occupancy Rate	0.943137	0.955041	0.974956	0.940865	0.923605	0.939902	0.000000
17. Persons Per Household	2.735450	3.059075	2.760000	2.408495	2.308276	2.193512	0.000000
18. Household Population	118,962	74,605	1,463	5,400	33,726	3,768	0

19. Group Quarters Population	1,535
20. All Population = (18) + (19)	120,497

*Less Other Military Housing or population in Other Housing if applicable.

2013 Population for Review and Comment: 120,500



SECTION 3. DEVELOPMENT OF MOBILE HOMES, SPECIAL UNITS AND GROUP QUARTERS These are the housing and population categories that require a count by the cities each year on the data collection form (Form A).

	Count of Mobile Homes/TR	Count of Special Housing Units	Count of Population in Special Housing Units	Count of Group Quarter Population
1. Base Census Count	1,224	0	0	1,390
2. City Count at Base Census.....	1,224	0	0	105
3. City Count at Estimate date 2013.....	1,828	0	0	250
4. Difference = (3) - (2).....	604	0	0	145
5. Annexations 4/2/2012 through 4/1/2013	0	0	0	0
6. Estimate 2013 =(1) + (4) + (5)	1,828	0	0	1,535

*Less Other Military Housing or population in Other Housing if applicable.

COMMENTS:

To be consistent with the 2010 Census count of GQ, Weatherly Inn Assisted Living was removed from OFM's GQ tracking.

EXHIBIT B

DECLARATION OF CHRISTOPHER ORGON, SNL FINANCIAL LC

I, Christopher Orgon, do hereby declare and state under penalty of perjury as follows:

1. I am the Senior Industry Expert for the Media & Communication Industry for SNL Financial ("SNL"). My job responsibilities include effective competition analysis, MediaCensus (video subscriber estimation), and various other data content roles.
2. In this capacity at SNL, I use, and oversee the use of, a Geographic Information System, which includes commercial mapping software that captures information related to USPS ZIP+4 Codes, USPS national 5-Digit ZIP Codes, and geographic/political boundaries. This software enables SNL to overlay ZIP Code territories, ZIP+4 centroids and geographic/political boundaries and determine the overlap.
3. The cities of Burien, WA and Kent, WA were originally analyzed using a 2012 dataset, which was based on 2010 Census boundaries for these communities. The newly annexed areas of Burien and Kent were not included in this 2012 dataset and, therefore, were not analyzed. We recently obtained and accessed a more recent, 2013 dataset, which provided the complete boundaries for both cities - including the respective areas annexed by Burien and Kent. An analysis was then performed on the individual annexed areas to provide the ZIP+4 Codes associated with each of the annexed areas.

Name: 
Christopher Orgon, SNL Financial LC

Date: 9/16/2014

EXHIBIT C

ECTR – Effective Competition Tracking Report



Provided by
Satellite Broadcasting and Communications Association

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated January 2, 2014 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: January 6, 2014

ZIP Codes

DTH Count

Requested total for Burien, WA	1138
--------------------------------	------

Data is current through 11/30/2013

Report Prepared by:
Martin Esteves
Program Manager
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

; oldest data from 2013-11-30

981461830	1
981461842	1
981461911	0
981461912	0
981461938	1
981461940	0
981461942	0
981461962	0
981461964	2
981461966	0
981462000	0
981462042	0
981462057	0
981462059	0
981462061	0
981462116	0
981462243	2
981462244	1
981462258	0
981462266	0
981462267	0
981462307	2
981462336	0
981462360	0
981462361	0
981462362	2
981462363	3
981462365	3
981462431	0
981462601	1
981462603	1
981462605	0
981462606	0
981462611	1
981462616	0
981462652	0
981462656	1
981462659	0
981462666	2
981462667	3
981462671	1
981462672	0
981462692	0
981462693	0
981462694	0
981462695	0
981462697	0
981462698	0
981462700	0
981462701	3

981462702	3
981462703	0
981462704	0
981462705	1
981462706	1
981462707	1
981462708	1
981462709	1
981462710	0
981462711	0
981462712	0
981462713	0
981462714	1
981462715	1
981462716	0
981462717	0
981462718	1
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Total	1138

ECTR – Effective Competition Tracking Report



Provided by
Satellite Broadcasting and Communications Association

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated January 2, 2014 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: January 6, 2014

ZIP Codes

DTH Count

Requested total for Kent, WA	1831
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Data is current through 11/30/2013

Report Prepared by:
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Program Manager
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

; oldest data from 2013-11-30

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EXHIBIT D

Community	State	DBS Subs Reported in Petition	DBS Subs for Annexed Areas	Total DBS Subscribers	2010 Census Households Reported in Petition Plus Households for Annexed Areas	% of DBS Penetration In Franchise Area Column E / Column F
BURIEN	WA	2,302	1,138	3,440	18,388	18.71%
KENT	WA	5,268	1,831	7,099	42,626	16.65%

CERTIFICATE OF SERVICE

I, Deborah Williams, do hereby certify on this 16th day of January, 2014 that a true and correct copy of the foregoing "Supplement" has been sent via U.S. mail, postage prepaid to the following:

William Lake, Chief
Media Bureau
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Ms. Monica Lusk
City Clerk
City of Burien
400 SW 152nd Street, Suite 300
Burien, WA 98166

Mr. Derek Matheson
City Manager
City of Covington
16720 SE 271st Street, Suite 100
Covington, WA 98042

Ms. Marcia Hopkins
City Clerk
City of Enumclaw
1339 Griffin Ave
Enumclaw, WA 98022

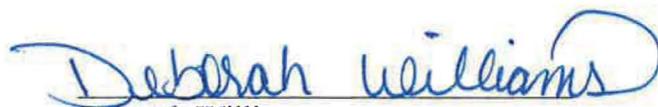
Mr. Thomas Fichtner
IT Manager
City of Federal Way
33325 8th Avenue S.
Federal Way, WA 98003-6325

Mr. Ronald Moore
City Clerk
City of Kent
220 Fourth Ave S.
Kent, WA 98032

Mr. Davis Johnston
City Manager
City of Maple Valley
PO Box 320
Maple Valley, WA 98038

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City Manager
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SeaTac, WA 98188

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Ogden Murphy Wallace, PLLC
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Deborah Williams